

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
)	
v.)	CRIMINAL NO. 05-30030-MAP
)	
)	
MICHAEL CECCHETELLI,)	
and)	
CHARLES HOWARD,)	
Defendants.)	

**THE GOVERNMENT'S MOTION TO EXTEND THE TIME FOR COMPLYING WITH THE
COURT'S DISCOVERY ORDER**

The United States of America, by Michael J. Sullivan, United States Attorney for the District of Massachusetts, respectfully requests this Court to enlarge the time for providing the discovery materials, as ordered by this Court on December 1, 2005, until January 6, 2006.

In support of this motion, the Government states the following:

1. Although the government has substantially complied with the Court's findings of December 1, 2005, the undersigned assistant U.S. Attorney's competing caseload has prevented the government from finishing its review of all the potentially discoverable information. Specifically, on December 19, 2005, the undersigned assistant U.S. Attorney, in the matter of the United States v. Garrett Gordon (Dkt. 2003-cr-30044), received a trial date of January 3, 2006.

Although this matter was subsequently continued on December 22, 2005, pursuant to the Defendant's motion, the undersigned assistant U.S. Attorney was preoccupied from December 19 through December 22 preparing for trial in this matter.

2. The FBI maintains the informant's file in Boston, MA. The undersigned assistant U.S. Attorney intends on making a second trip to Boston on or about January 4, 2006, for a second review of the file.

Filed this 3rd day of January, 2006.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Paul Hart Smyth

Paul Hart Smyth
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

Hampden, ss.

Springfield,
Massachusetts
January 3, 2006

I, Paul Hart Smyth, Assistant U.S. Attorney, do hereby certify that I have served a copy of the foregoing to Attorney Linda Thompson, by facsimile and first class mail to 1331 Main Street, Springfield, MA.

/s/ Paul Hart Smyth
Paul Hart Smyth
Assistant U.S. Attorney